

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RENÉ QUIÑONEZ and MOVEMENT INK
LLC,
Plaintiffs,
v.
UNITED STATES OF AMERICA,
Defendant.) Case No. 3:22-CV-03195-WHO
)
) **DECLARATION OF JEFFREY AGSTER**
) **REGARDING SEALED MATERIAL**
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I, Jeffrey Agster, declare as follows:

1. I am a Postal Inspector with the United States Postal Inspection Service (USPIS). I have been employed by USPIS for approximately 20 years. I am currently assigned as the Program Manager overseeing the Administrative Nonmailability Protocol (ANP). I have overseen the ANP since 2018.

2. The ANP is an administrative procedure that USPIS may use to detain, document, and process mailpieces reasonably suspected of containing nonmailable matter. This procedure has been in effect since approximately 2018.

3. The specific details regarding ANP included in deposition testimony, deposition exhibits, and documents produced in this lawsuit contain sensitive law enforcement information about the use of ongoing and proactive law enforcement techniques. If such information were made public, it would jeopardize the ANP program by alerting potential criminal actors of currently undisclosed techniques and procedures, including how law enforcement officers identify parcels suspected of containing narcotics, and other information known only to law enforcement.

4. The appearance of sensitive information regarding the ANP program in the public record would inform criminal actors of the details of the ANP procedure which could lead to their ability to

1 change their methods to potentially evade detection. Such disclosures would disrupt the ANP procedure
2 and the effectiveness of the ANP program.

3 I declare under penalty of perjury under the laws of the United States that the above is true and
4 accurate. Executed this 4th day of October, 2024, in Phoenix, Arizona.

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6 DATED: October 4, 2024
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JEFFREY AGSTER